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November 11, 2024

**VIA ECF**

Honorable Renée Marie Bumb, C.U.S.D.J.  
United States District Court  
District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4<sup>th</sup> & Cooper Streets  
Camden, NJ 08101

**Re:    *Guy A. Shaked Investments, Ltd., et al. v. Ontel Products Corp.***  
**Docket No. 1:20-cv-9901 (RMB-EAP)**

Dear Chief Judge Bumb:

This firm is counsel to Plaintiffs Guy A. Shaked Investments, Ltd. and DAFNI Hair Products, Ltd., (collectively “DAFNI”) in the above-referenced matter. We write jointly with counsel for Defendant Ontel Products Corporation (“Ontel”) to provide a status update.

DAFNI recently retained Dunlap, Bennett & Ludwig to represent DAFNI in this matter and submitted a motion seeking *pro hac vice* admission for counsel. To allow new counsel sufficient time to get up to speed in the litigation and for further discussions with Ontel, DAFNI respectfully requests that the parties submit a joint status report in 60 days. Accordingly, DAFNI proposes that the parties jointly report back to the Court by **January 10, 2025**.

As set forth in the parties’ prior status letters dated July 29, 2024 and September 12, 2024, Ontel continues to seek resumption of the litigation without unnecessary delay. Accordingly, and in view of the appearance of Dafni’s new litigation counsel, Ontel respectfully requests that the Court establish a date-certain on which the case will resume rather than setting another joint report date. Ontel believes that such action is appropriate given the significant time that has already elapsed since the present stay began.

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If DAFNI's request meets with the Court's approval, we ask that Your Honor please enter "So Ordered" below. We thank the Court for consideration of this request.

Respectfully submitted,

s/ Maureen T. Coghlan

MAUREEN T. COGHLAN

MTC

cc: All counsel of record via ECF

It is SO ORDERED as of this \_\_\_\_ day of November, 2024.

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HON. RENÉE MARIE BUMB, C.U.S.D.J.